

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED - FOR PUBLIC INSPECTION

June 29, 2015

Accepted / Filed

Federal Communications Commission Office of the Secretary

Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re:

WC Docket No. 14-58

2015 ETC Annual Report of ComSouth Telecommunications

Study Area Code 220369

Dear Ms. Dortch:

On behalf of ComSouth Telecommunications ("ComSouth"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. 1 ComSouth seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuvkendall JSI Vice President

301-459-7590

ikuvkendall@isitel.com

cc: Charles Tyles, To ecommunications Access Policy Division (two copies, confidential) No. of Copies rec'd_

List ABCDE

^{1 47} C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Federal Communications Commission Office of the Secretary

Re:

WC Docket No. 14-58

2015 ETC Annual Report of ComSouth Telecommunications

Study Area Code 220369 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client ComSouth
Telecommunications (the "Company") hereby requests, pursuant to Sections 0.457 and
0.459 of the Commission's rules, withholding from public inspection certain information
contained in an attachment to the above referenced reporting requirement. The Company
provides the following in support of its request, numbered consistent with the
subparagraphs of Section 0.459(b).²

- 1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan") which is contained in the attachment to the 2015 Report.⁴
- 3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

^{1 47} C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

^{3 47} C.F.R. §§ 54.313, 54.422.

⁴ See In the Matter of Connect America Fund, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories." Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

- 5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

Request for Confidentiality Page 3

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

- 7. Any previous versions of this information are not publicly available.
- 8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

ECC For	or 491 - Carrier Annual Reporting REDAX Data Collection Form	TED FOR PUBLIC	ACTION - OFFICE SECTION - NO SE	d The Samuel County (Samuel Say Make All)
<010>	Study Area Code	220369		
<015>	Study Area Name	COMSOUTH TELECOMM		Accepted / Filed
<020>	Program Year	2016		1000bled Filed
<030>	Contact Name: Person USAC should contact with questions about this data	Scott Obert-Thorn		JUN 29 2015
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4788923022 ext.		Federal Communications Commission
<039>	Contact Email Address : Email of the person identified in data line <030>	scott@comsouth.net		Office of the Secretary
ARMUA	L REPORTURG FOR ALL CARRIERS			(check box when complete)
<100>	Service Quality Improvement Reporting		(complete attached worksheet)	1 6. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.
	Outage Reporting (voice)		(complete attached worksheet)	/ /
<210> <300>	Unfulfilled Service Requests (voice)	o outages to report		1 11/16/11
<310>	Detail on Attempts (voice)		(attach c	descriptive document)
<320>	Unfulfilled Service Requests (broadband)			
<330>	Detail on Attempts (broadband)		(attach	descriptive document)
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed 0.0			/ /
<420> <430>	Mobile 0.0 Number of Complaints per 1,000 customers (broad	hand)		
<440>	Fixed 0.0			A SHARM
<450> <500>	Mobile 0.0 Service Quality Standards & Consumer Protection R	ules Compliance	(check to indicate certification)	/ /
<510>	220369ga510.pdf		(attached descriptive document)	/ /
<600>	Functionality in Emergency Situations 220369ga610.pdf		(check to indicate certification)	
<610>			(attached descriptive document)	
<700>	Company Price Offerings (voice)		(complete attached worksheet)	- VERILLE
<710>	Company Price Offerings (broadband)		(complete attached worksheet)	- William
<800>	Operating Companies and Affiliates	n ^c 2	(complete attached worksheet)	
	Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Certification		f yes, complete attached worksheet) Yes	
<1010>			(attach descriptive document)	
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) O	(if not, check to indicate certificat	ion)
<1110>			(complete attached worksheet)	411111
<1200>	Price Can Carriers Proceed to Price Can Additional	Documentation Mo-	(complete attached worksheet)	
	Price Cap Carriers, Proceed to Price Cap Additional Including Rate-of-Return Carriers affiliated with Pri	SET SEED TOWN VERSE OF THE		
<2000>		sop zoen knemmy	(check to indicate certification)	11666
<2005>	Rate of Return Carriers, Proceed to ROR Additional	Documentation Wor	(complete attached worksheet) ksheet	19. 19. 19. 18
<3000>			(check to indicate certification)	1 111111.
<3005>	7000		(complete attached worksheet)	1 1 1 1 1 1 1 1

	rvice Quality Improvement Reporting			FCC Form 481 OMB Control No. 3060-0986 July 2013	S/OMB Control No. 306	60-0819
<010>	Study Area Code 2:	20369				
<015>	Study Area Name	OMSOUTH TELECOMM				
<020>	Program Year 2	016	17			
:030>	Contact Name - Person USAC should contact regarding this data	cott Obert-Thorn	A STATE OF THE STA		Later distribution and the second	
:035>	Contact Telephone Number - Number of person identified in data line <030>	788923022 ext.				
:039>	Contact Email Address - Email Address of person identified in data line <030> s	cott@comsouth.net				
<110>	Has your company received its ETC certification from the FCC?	(yes / no)	00	System in the last		
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	00	W		
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your com CETC which only receives frozen support, your progress report is only required to address voice telephony service.		69ga112.pdf			
	Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-ye service quality improvement plan pursuant to \$54.202(a). The information shall be submitted at the wire center level or census block as appropriate.		1	Name of Attached Document	e e	
113>	Maps detailing progress towards meeting plan targets		Yes	7		
114>	Report how much universal service (USF) support was received		Yes			
115>	How much (USF) was used to improve service quality and how support was used to improve	service quality	Yes			
116>	How much (USF) was used to improve service coverage and how support was used to improve	e service coverage	Yes			
117>	How much (USF) was used to improve service capacity and how support was used to improve	employed by behavior almost in-	Yes	┥		
118>	Provide an explanation of network improvement targets not met in the prior calendar year.	•	Not Applicable	┪		

(200) Service Outage Reporting (Voice)

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	220369	
<015>	Study Area Name	COMSOUTH TELECOMM	
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn	
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@comsouth.net	

<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<₽	<₽	<h></h>
NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@comsouth.net
<701>	Residential Local Service Charge Effective Date 1/1/2015	

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
		-						
	-		**					
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	ļ			- See a	tached worksheet			
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		Self-2013
<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
<039>	Contact Email Address - Email Address of nerson identified in data line <030>	scott@comsouth.net

	eds .						<d3×< th=""><th>484></th></d3×<>	484>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select
	- 1820 10 0 000							
				1000000				
			- See attac	hed				
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ità Coli	ection Form		#CC Fermi 481. ONIS CSEL/IS No. 3000-0986 (Owis Control No. specios) Subjection 481. ONIS CSEL/IS No. 3000-0986 (Owis Control No. specios) Subjection 481.				
<010>	Study Area Code		220369				
<015>	Study Area Name		COMSOUTH TELECOMM				
<020>	Program Year		2016				
<030>	Contact Name - Person	USAC should contact regarding this data	Scott Obert-Thorn				
<035>	Contact Telephone Nun	nber - Number of person identified in data line <030>	4788923022 ext.				
<039>	Contact Email Address -	Email Address of person identified in data line <030>	scott@comsouth.net				
<810>	Reporting Carrier	ComSouth Telecommunications					
<811>	Holding Company	ComSouth Corporation					
<812>	Operating Company	ComSouth Telecommunications					

and the second s		76
Affiliates	SAC	Doing Business As Company or Brand Designation
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		PECHNOLOGY CONTROL OF THE CONTROL OF
-	 See attached worksheet - 	-
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March 1985 1985 1987 1987 1987 1987	ection Form	CASE Control No. 3080-0614
<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn 4788923022 ext.
<035>	Contact Telephone Number - Number of person identified in data line <03	
<039>	Contact Email Address - Email Address of person identified in data line <0	30> scott@comsouth.net
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	Name of Attached Document
If your c	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes	
	m the status described on the attached document(s), on line 920,	
	trates coordination with the Tribal government pursuant to	Select
	S(a)(9) includes:	Yes or No or
	22 2 1 1W 1 1 1 1 1 2 2 1 1 1 1 1 1 1 1	Not Applicable
<921>	Needs assessment and deployment planning with a focus on Tribal	
	community anchor institutions.	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

	lo Terrestrial Backhaul Reporting	REC FormABL Corre cumbral No. 3000-0382/CVVB Control No. 3000-0819 (July-2013)
<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@comsouth.net
<1120>	Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	kbps

Lifeline	rms and Condition for Effeline Customers ection Form		PCC Form 481 ONAS CARROE No. 3060-0886/06/78 Control No. 3060-0819 Ally 2013
<010>	Study Area Code		220369
<015>	Study Area Name		COMSOUTH TELECOMM
<020>	Program Year		2016
<030>	Contact Name - Person USAC should contact regarding this data		Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data li	ne <030>	
<039>	Contact Email Address - Email Address of person identified in data	ine <030	scott@comsouth.net
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		220369ga1210.pdf
			Name of Attached Document
<1220>	Link to Public Website	НТТР	
or the we	neck these boxes below to confirm that the attached document(s), on line is being listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	1	•
<1222>	Details on the number of minutes provided as part of the plan,	1	
<1223>	Additional charges for toll calls, and rates for each such plan.		

(2000) Pr	los Cap Corrier Additional Decumentation	RCC form alth	(120
Data Coli	ection Form	DNA coales no. She being ble Control ha. 2000	0819
theladina	Rate-of-Return Carriers offiliated with Price Cap Local Exchange Chinese	₩ ,005	445 6
use habita	Charles B. / Ethin handlade, and Charles D. C. Sandan and Produced Philade Philade December Control of the American Control		-
<010>	Study Area Code		
<015>	Study Area Name	220369	
<020>	Program Year	COMSOUTH TELECOMM	
<030>	Contact Name - Person USAC should contact regarding this data	2016	- 14032540
<035>	Contact Telephone Number - Number of person identified in data line <030>	Scott Obert-Inorn	
<039>	Contact Email Address - Email Address of person identified in data line <030>	4786923022 EXC.	
		scottscomsouth.net	
ACCORDANGE AND AND ADDRESS OF THE PARTY OF T			
Select the	e appropriate responses below (Yes, No, Not Applicable) to note compliance as	s a recipient of incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge redu	uctions, a
Connect	America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The inform	rmation reported on this form and in the documents attached below is accurate.	
	Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1)i)		
<2011a>	3rd Year Certification (47 CFR § 54.313(b)(1)ii)		
<2011b>	Attachment (47 CFR § 54.313(b)(1)ii)		
		Name of Attached Document(s) Listing Required Information	
		W1	
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>			
<2013>		2	
<2014>	(기가 하다) 성 상태 회가 한 경기 구선 구선 가는 다시 아니라 가지 않는데 사람들이 되었다면 하지 않는데 하지 하지 않는데 하		
<2015>	2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))		
	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))		
<2016>	가게 있다면서 그 아니지 않아야 한다면서 하는데 하면 하면 하면 하면 하면 하면 하면 하는데		
	AND		
<2017>	Connect America Phase II Reporting (47 CFR § 54.313(e)) 3rd year Broadband Service Certification		
<2018	ord year broadbarid bervice certification		
<20192	Still fear bi baddella bel vice certification		
<2020>		ing 2021 contains the required information	
420207	pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support s	shall provide the number, names, and	
	addresses of community anchor institutions to which began providing		
	preceding calendar year.		
902000000			
<2021>	Interim Progress Community Anchor Institutions	1	
		į į	
		1	
		Name of Attached Document(s) Listing Required Information	

Document(s) for Belance Sheet, h	Document(s) for Balance Sheet, income Statement and Statement of Co
Attach the worksheet listing required	
(3026) Attach the wortsheet listing required information	Bearing the second of the State

	the DF Neturn Carrier Additional Debastumballos (Continued) Bission Form	
<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
<030°	Contact Empil Address - Empil Address of person identified in data line colors	

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	-
(3034) Dividends	

1997 (1997) (1997)	kon - Ausortiga Camilla. ection Form	GATE COMPANIES CONTRACT POLICE SOCIEDAD CONTRACTOR SOCIEDAD SOCIEDAD CONTRACTOR SOCIE
<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@comsouth.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support ecipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.				
Name of Reporting Carrier:				
Signature of Authorized Officer:	Date			
Printed name of Authorized Officer:				
Title or position of Authorized Officer:				
Telephone number of Authorized Officer:				
Study Area Code of Reporting Carrier:	Filing Due Date for this form:			

ion - Agert / Carriet ection Form	PCC Community OMB Compact No. Sect-OpenAppin Community - 9060-0819 PAR 2018
Study Area Code	220369
Study Area Name	COMSOUTH TELECOMM
Program Year	2016
Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
Contact Email Address - Email Address of person identified in data line <030>	scott@comsouth.net
	Study Area Code Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line <030>

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier I certify that (Name of Agent) John Staurulakis, Inc. is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. Name of Authorized Agent: John Staurulakis, Inc. Name of Reporting Carrier: COMSOUTH TELECOMM Signature of Authorized Officer: CERTIFIED ONLINE Printed name of Authorized Officer: Scott Obertthorn Title or position of Authorized Officer: Chief Financial Officer Telephone number of Authorized Officer: 4788923022 ext. Study Area Code of Reporting Carrier: 220369 Filling Due Date for this form: 07/01/2015 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. § 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or	LI Recipients on Behalf of Reporting Carrier
, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal sen he data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, t	2018 (1918년 B.) 전시에 시민들은 12개 (1918년) 전시 12시 12시 12시 12시 12시 12시 12시 12시 12시 12
Name of Reporting Carrier: COMSOUTH TELECOMM	eseements of the second of the
Name of Authorized Agent or Employee of Agent: John Staurulakis, Inc.	
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date: 06/26/2015
Printed name of Authorized Agent or Employee of Agent: Bob Ragsdale	
Title or position of Authorized Agent or Employee of Agent Manager - Regulatory Affairs	
Felephone number of Authorized Agent or Employee of Agent: 7705692105 ext.	
Study Area Code of Reporting Carrier: 220369 Filing Due Date for this form:	07/01/2015

Attachments

REDACTED - FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY

The ComSouth Telecommunications' demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

ComSouth Telecommunications, Inc. ("ComSouth") hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules.

ComSouth is subject to consumer protection obligations under Georgia state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Rules of the Georgia Public Service

Commission which discloses rates, and terms and conditions of service to customers (Chapter 515-12-1-.02(5)(a) and .04(5) of the Rules of the Georgia Public Service

Commission); (2) adherence to state

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² Id. at para. 28.

³ Id. The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." Id. at n. 71.

consumer protection requirements governing telephone providers which require Service Standards (Chapter 515-12-1-.17 and .18 of the Rules of the Georgia Public Service Commission); Customer Billing (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission; and Customer Complaints (Chapter 515-12-1-.08 of the Rules of the Georgia Public Service Commission); (3) truth-in-billing requirements (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

The ComSouth Telecommunications' demonstration of ability to function in emergency situations for voice and broadband services:

ComSouth Telecommunications, Inc. ("ComSouth") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. §54.202(a)(2)¹ and Chapter 515-12-1-.11(4) of the Rules of the Georgia Public Service Commission. ComSouth's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by 47 C.F.R. §54.202(a)(2) and Chapter 515-12-1-.11(4) of the Rules of the Georgia Public Service Commission. ComSouth can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow ComSouth to manage traffic spikes throughout its network, as emergency situations require. In addition, the Company has redundancy for connectivity purposes via additional routes and electronic equipment for both voice and broadband services.

Specifically, the central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. ComSouth has battery backup at the central office location and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment.

The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

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Data Col	ce Offerings including Vollor Kinte Data lection Form	FECTOR ME Confliction to 3000 chas/Only Control No. 3000-0519 (A) 2013
<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@comsouth.net
<701>	Residential Local Service Charge Effective Date 1/1/2015	

<703>

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fed
GA	Hawkinsville		PR	19.82	0.0	0.57	0.0	20.39
								
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							***************************************	<u> </u>
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	DV-WINET		V-20-27	La Company				

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(710) Broadband Price Offerings

Date Collection Form

Only Control No., 5000-0985/Dies Control No., 5000-0919
Suly 2013

<010>	Study Area Code	220369
<015>	Study Area Name	COMSOUTH TELECOMM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Number - Number of person identified in data line <030>	4788923022 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@comsouth.net

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State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
GA.	A11	49.95	0.0	49.95	10.0	1.0	999999.0	Other, No Usage Limit
ga	A11	69.95	0.0	69.95	16.0	1.5	999999.0	Other, No Usage Limit
GA	A11	99.95	0.0	99.95	30.0	2.5	999999.0	Other, No Usage Limit
GA	A11	129.95	0.0	129.95	150.0	3.0	999999.0	Other, No Usage Limit
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								1874 Tail 18

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2500 250 19	erating Compenies		FCC Focus 4E1 Clies Control No. 1060-0-96/Chies Control No. 1080-0819
Data Col	ection Form		See, 2013
<010>	Study Area Code		220369
<015>	Study Area Name		COMSOUTH TELECOMM
<020>	Program Year		2016
<030>	Contact Name - Person L	JSAC should contact regarding this data	Scott Obert-Thorn
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	4788923022 ext.
<039>	Contact Email Address -	Email Address of person identified in data line <030>	scott@comsouth.net
<810>	Reporting Carrier	ComSouth Telecommunications	
<811>	Holding Company	ComSouth Corporation	
<812>	Operating Company	ComSouth Telecommunications	

Affiliates	SAC	Doing Business As Company or Brand Designation
	5.00	
ComSouth Teledata		ComSouth Telecommunications, Inc.
ComSouth Teledata		ComSouth Telesys, Inc.
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COMSOUTH TELECOMMUNICATIONS, INC. SECTION C
HAWKINSVILLE, GA SIXTEENTH REVISED SHEET 1
REPLACES FIFTEENTH REVISED SHEET 1

LOCAL EXCHANGE RATES

A. GENERAL

В.

The rates specified herein entitle subscribers to access all exchange access lines in the subscriber's county of residence within the same LATA and all exchange access line bearing the exchange designation of ComSouth Telecommunications.

(T)

A.1 Definitions

A.1.1 Network Access Charge – The recurring monthly charge for residential or business service that accounts for network services through the protector bringing the entire local and national network to the premise.

A.1.2

B. Rates - Network Access Charge

Residence - 1 Party

Effective January 1, 2014

\$19.82

(I)

Business – 1 Party

\$34.14

Deleted

(D)

D. The rates in paragraph B above provide access as defined in A.1.1 only.

Issued: November 25, 2014

Robert W. Krueger, President

Effective: January 1, 2015

COMSOUTH TELECOMMUNICATIONS, INC. HAWKINSVILLE, GA

SECTION D SECOND REVISED SHEET 11

LIFELINE ASSISTANCE PROGRAM

(C)

A. LOW-INCOME PROGRAM

The Company, as part of its obligations as an Eligible Telecommunications Carrier, offers a low-income assistance program. This program, Lifeline Assistance, is offered under the terms and conditions provided below:

Lifeline Assistance

a. General

Lifeline Assistance is a non-transferable retail service offering for which qualifying low-income subscribers pay reduced charges, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for voice telephony service that includes the following services: voice-grade access to the public switched network or its functional equivalent; local usage; access to emergency services; and toll limitation.

b. Regulations

Subscribers are eligible for Lifeline Assistance if:

- The subscriber's household income is at or below 135 percent of the Federal Poverty Guidelines, or
- 2) The subscriber, or one or more of the subscriber's dependents or the subscriber's household, receives benefits from at least one of the following qualifying programs:

Medicaid;

Supplemental Nutrition Assistance Program (SNAP),
formerly known as Food Stamps;
Supplemental Security Income (SSI);
Federal Public Housing Assistance;
Low-Income Home Energy Assistance Program (LIHEAP);
National School Lunch Program's free lunch program;
Temporary Assistance for Needy Families (TANF);
Low Income Senior Citizens discount plan offered by a
local gas or power company

(C)

COMSOUTH TELECOMMUNICATIONS, INC. HAWKINSVILLE, GA

SECTION D SECOND REVISED SHEET 12

LIFELINE ASSISTANCE PROGRAM

(C)

- A. LOW-INCOME PROGRAM (Cont'd)
 - Lifeline Assistance (Cont'd)
 - b. Regulations (Cont'd)
 - Other eligibility requirements may be established by the Commission.
 - Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that s/he receives benefits under a program outlined in sub-paragraphs (a) through (c), above, and must, on that same document, agree to notify the Company if s/he ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certifications in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service administrators.
 - A subscriber may elect at the time of subscription to Lifeline Assistance to receive toll limitation as part of Lifeline Assistance. "Toll limitation" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence.

C)

COMSOUTH TELECOMMUNICATIONS, INC. HAWKINSVILLE, GA

SECTION D SECOND REVISED SHEET 13

LIFELINE ASSISTANCE PROGRAM

(C)

- A. LOW-INCOME PROGRAM (Cont'd)
 - 1. Lifeline Assistance (Cont'd)
 - b. Regulations (Cont'd)
 - 6) Lifeline Assistance will not be disconnected for non-payment of toll charges, unless the Company first demonstrates to the Commission that the Company would incur substantial costs, that the Company offers toll limitation without charge, and that telephone subscribership among low-income subscribers in the Company's service area is greater than or equal to the national subscribership rate for low-income consumers. For purposes of this paragraph, a "low-income consumer" is one with an income below the poverty level for a family of four residing in Georgia. The Company shall follow all applicable notice provisions as established, from time to time, by the Commission, as part of the waiver process, and to implement a waiver, if granted. The Company may reapply for the waiver as necessary.
 - The Company may not collect a service deposit in order to initiate Lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Company, where available or if the qualifying low-income subscriber elects a calling plan that does not distinguish between toll and non-toll calls in its pricing. If toll blocking is unavailable, then the Company may charge a service deposit.

(C)

Robert W. Krueger President / CEO Effective Date: June 1, 2012

COMSOUTH TELECOMMUNICATIONS, INC. HAWKINSVILLE, GA

SECTION D SECOND REVISED SHEET 14

LIFELINE ASSISTANCE PROGRAM

(C)

- A. LOW-INCOME PROGRAM (Cont'd)
 - Lifeline Assistance (Cont'd)
 - c. Effective August 1, 2012, the Lifeline credit available to an eligible customer in Georgia is equal to the total of federal support as established by the Federal Communications Commission. The amount of credit will not exceed the charge for local service, which includes the access line, the Subscriber Line Charge and local usage.
 - d. The Company shall apply the baseline payments received by the administrator of the federal Lifeline Assistance program to waive the qualifying customer's federal Subscriber Line Charge. The Company shall apply any additional federal support amount to the qualifying customer's basic local exchange service rate.
 - e. To be eligible for Lifeline Assistance, qualifying customers must subscribe to a flat-rate basic local exchange service offering that is made available in the Company's service area.
 - f. Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.
 - All aspects of the Lifeline Assistance program shall be subject to the interpretation
 of applicable Federal regulations and any directives which may from time to time be
 prescribed by the Universal Service Administrative Company. These rules are separate
 and apart from any rules prescribed as part of a state Universal Service program.
 - (Deleted)

(D)

(C)

(D)

ComSouth Telecommunications (SAC 220369)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

ComSouth Telecommunications hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

ComSouth Telecommunications (SAC 220369)

Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. ComSouth provided a list of community anchor institutions to which it provides service in its July, 2014. The following should be included in the list:¹

Name	Address		
Antioch Baptist Church	449 Paul Scarborough Rd		
Blue Springs Baptist Church	Blue Springs Rd		
Broad Baptist Church	Broad Street		
Christian Friends Baptist Church	NorthWoods St		
Corinth Baptist Church	145 Corinth Church Rd		
County Line Baptist Church	1115 North County Line Rd		
First Baptist Church	Broad St		
Hartford Baptist Church	Hartford		
Midway Baptist Church	Route 1		
Riverside Baptist Church	South Houston Rd		
Trinity Baptist Church	Hartford		

The FCC has defined ommunity anchor institutions in Section 54.5 of its Rules as "schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities."

Westview Baptist Church	Columbus Hwy
St Thomas AME Church	Second St
Anderson Gift Baptist Church	Regur Rd
Big Poplar Spring Baptist Church	7725 Pinehurst-Hawkinsville Rd
Double Branch Freewill Baptist Church	3011 Williams Rd
Green Grove Baptist Church	Hwy 26E
Harmony Baptist Church	Pinehurst-Hawkinsville Rd
Lynnwood Baptist Church	Snow Rd
Macedonia Baptist Church	Macedonia Rd
New Hope Baptist Church	414 S Union St
Oak Grove Baptist Church	Blackshear Tr
Piney Grove Baptist Church	Gooseneck
Peasant Grove Baptist Church	823 Hwy 247
Sandridge Baptist Church	Blue Springs
Springfield Baptist Church	Liberty St
Jehovah's Witness Kingdon Hall	Cochran Hwy
Christ Worship Center	593 Vienna Hwy
St Luke's Episcopal Church	Dooley at Broad
New Vision Ministries	W Broad St
Bellview Holiness Church	Tippitville Rd
Church of God by Faith	Commerce St

Christian Hope Baptist Church	Mart Luther King Jr Blvd		
Faith Independent Baptist Church	Snow Rd		
Hawkinsville Church of God	Liberty St		
King Chapel Primitive Baptist Church	407 S Dooley		
Lizzie Bloomer Baptist Church	Upper River Rd		
New Zion Baptist Church	Davis Rd		
New Mt Zion Community Baptist Church	35 Martin Luther King Jr Blvd		
United Fellowship Baptist Church	Lower River Rd		
Union Chapel Baptist Church	84 Firetower Rd		
The Church of the Kingdom of God	25 Woodrow Miller St		
Straight & Narrow Way Ministries	223 N Jackson St		
Salem Salome Baptist Church	Lower River Rd		
Pentecostal Episcopal Church of God	4 th & Lumpkin Sts		
New Mount Mariah Baptist Church	Eastman Hwy		
First United Methodist Church	Merritt		

REDACTED - FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026 ATTACHMENT REDACTED IN ENTIRETY